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Attorneys for Richard Walter

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of **S.M.**, a minor,

Plaintiffs,

v.

MARK DANIELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, ESTATE OF DAVE HALL, VIDOCQ SOCIETY, CITY OF COQUILLE, CITY OF COOS BAY, COOS COUNTY, and OREGON STATE POLICE.

Defendants.

Case No.: 6:20-cv-01163-MK (Lead Case)

**RICHARD WALTER'S RESPONSE
JOINING STATE'S MOTION FOR
EXTENSION**

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of **S.M.**, a minor,

Plaintiffs,

v.

OREGON STATE POLICE.

Defendant.

VIDOCQ SOCIETY,

Cross-Claim Plaintiff,

v.

MARK DANIELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, ESTATE OF DAVE HALL, CITY OF COQUILLE, CITY OF COOS BAY, COOS COUNTY, and OREGON STATE POLICE,

Cross-Claim Defendants.

RICHARD WALTER,

Cross-Claim Plaintiff,

v.

MARK DANIELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, VIDOCQ SOCIETY, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, ESTATE OF DAVE HALL, CITY OF COQUILLE, CITY OF COOS BAY, COOS COUNTY, and OREGON STATE POLICE,

Cross-Claim Defendants.

Case No.: 3:21-cv-01719-MK (Trailing Case)

CERTIFICATE OF CONFERRAL

Pursuant to L.R. 7-1, undersigned counsel has conferred or sought to confer in good faith with the respective parties' counsel before filing this joinder. Defense counsel do not object to this joinder. The undersigned has left voicemail messages with plaintiff's counsels Puracal and Lauersdorf this morning, but have not reached them directly, and therefore respectfully cannot certify their positions at the time of filing.

RESPONSE AND JOINDER

Counsel for Richard Walter respectfully joins in the State Defendants' Motion for Extension of Time to File Motion for Summary Judgment. The request to join is based upon counsel's representation of personal circumstances in which a close family member has required emergency medical care as of December 30, 2024, which is continuing in nature through the present time, and which pragmatically negatively impacts counsel's ability to focus upon the completion of the anticipated filing of a motion for summary judgment on behalf of defendant/cross-claim plaintiff Richard Walter. *See*, Declaration of counsel.

DATED this 2nd day of January, 2025.

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By: /s/ Eric S. DeFreest
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